

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

**Latasha Holloway, *et al.*,**

**Plaintiffs,**

**v.**

**City of Virginia Beach, *et al.*,**

**Defendants**

**Civil Action No. 2:18-cv-0069**

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**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

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**PLAINTIFFS' EXHIBIT 22**

Declaration of Plaintiff Georgia Allen

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**DECLARATION OF GEORGIA ALLEN**

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Pursuant to 28 U.S.C. § 1746, I, Georgia Allen, declare that:

1. I am over the age of 18 and competent to testify as to the matters set forth in this declaration based upon my own personal knowledge.
2. I am a registered voter in Virginia Beach. I am an African American. I have lived in Virginia Beach for over 25 years. I have been active in civil rights and political rights in the City of Virginia Beach for some 20 years. Most of my work has been through the Virginia Beach Branch of the NAACP where I currently serve on the Executive Committee. I served as President of the Virginia Beach NAACP from 2001 to 2010. I have also been a Youth Advisor and done Political Action & Youth work with the Branch.

3. For many years, I, along with community leaders in the Asian-American and Latino communities in Virginia Beach, worked to advance the particularized needs of our communities. In doing so, our three minority communities acted together as a united coalition. I was particularly involved in this coalition work from 2001-2010 when I was the president of the Virginia Beach NAACP. Leaders from the different minority groups, including myself, would meet regularly to discuss developments in Virginia Beach and whether or not our communities were getting what we needed.

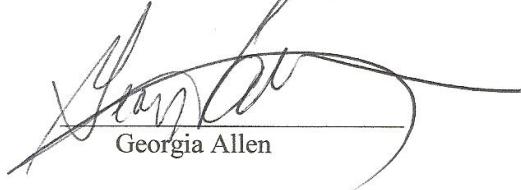
4. In October 2001, I had occasion to attend and speak at a public hearing on redistricting held by the Virginia Beach City Council. I attended that meeting as a member of a large coalition of minority groups in Virginia Beach, the Community Coalition for a Better Virginia Beach. Several members of the coalition spoke at the October 2001 meeting, including myself. I explained to the City Council at that meeting that our Coalition “included the Asian American Community, the Philippino-American Community, the Chinese American Community, the Cambodian Community as well as the African American Community.” DEF 02167. Later in the meeting, a leader in the Philippino community, Mr. Ron Villanueva, provided the City Council with his description of the coalition: “I am a proud member of the Community Coalition for a Better Virginia Beach, the one that is assembled here tonight. From what Georgia [Allen] talked about earlier, it’s a broad-based coalition of Asians, Hispanics, African-Americans, Indians, people of all backgrounds that are wishing to seek a more equitable system of representation. This Coalition is diverse as our beloved City and it is much more united.” DEF 02171. At that meeting, on behalf of the Coalition, I expressed the view that the at-large election system in Virginia Beach “does not provide a fair opportunity for citizens who are racially and ethnically diverse to elect a candidate of their choice to Council.” DEF 02167.

5. In 2002, the former city treasurer, John Atkinson, made two derogatory remarks.

In the first statement, Atkinson used the phrase “the dark-skinned” when referring to indigent taxpayers and, in the second, Atkinson used the phrase “no ticky, no laundry”—a racist expression that is derogatory towards the Chinese-American community. These racist remarks resulted in the various minority communities in Virginia Beach coming together once again to confront this racism by a city official. Members of the minority community in Virginia Beach demanded accountability under the name the Diverse Communities Coalition. That coalition included myself, Shewling Wong (now Moy), Filipino community activist Nony Abrajano, Latino then-deejay Beatriz Amberman, Alicia Bobulinski from the Making a Difference Foundation, and Asian leader Jagdish Singh. The Coalition participated in at least two silent protests outside the City Treasurer’s office. Additionally, the Coalition distributed a letter which was quoted at a City Council meeting at the time. These racist remarks, though unfortunate and alarming, produced once again an opportunity for the Asian-American, the Latino and the African-American communities to coalesce around important issues that directly impacted their common interests.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 1, 2019



Georgia Allen